

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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**APR 22 2024**

CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

United States Securities and Exchange  
Commission,

Plaintiff,

Case No.: 21-cv-1445 (DSD/ECW)

v.

Mark A. Miller, Saeid Jaberian, and  
Christopher J. Rajkaran,

Defendants.

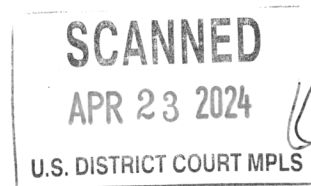
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**DECLARATION OF DEFENDANT SAEID JABERIAN IN SUPPORT OF  
MOTION TO EXTEND PRETRIAL SCHEDULE**

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I, Saeid Jaberian, hereby declare under penalty of perjury as follows:

1. I am a defendant in the above matter.
2. The proposed pretrial schedule was drafted on November 16, 2023 and agreed on December 1, 2023 with the SEC. The schedule was designed to give me nine months for discovery, which was necessary for my defense.
3. I had a brief conversation with the SEC's attorney Alyssa Qualls right after that and before the new year and, at that time, I was told I would receive all documents in a couple of weeks.
4. The next communication with the SEC's attorney was on February 23, 2024. Ms. Qualls requested that I sign a protective order to be sent back. I sent back the protective order immediately.
5. I received the SEC's documents on a hard drive on March 15, 2024. I lost 3.5 months of valuable time to start my discovery.



6. I do not have an attorney and I only get consultation as needed through the Pro Se Project with Julie Firestone of Lewis Brisbois. Defending this lawsuit while remaining employed and supporting my family is a significant hardship for me.

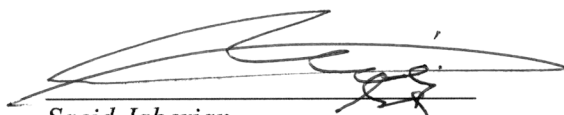
7. Although I understand there is still time in the discovery period, there was a reason I originally requested nine months to do the discovery. I have received a huge file from SEC. I need to go over the documents and prepare my defense and figure out who to depose and subpoena. Therefore, I am requesting a three-month extension of the discovery period.

8. I asked Ms. Qualls to agree to this request, but she declined. She replied that the close of discovery is not until September 3, and if in August I still need more time, she would consider it then.

9. However, I do not want to wait until the time is almost gone before I ask for an extension. At this point I am already convinced I do need the extra time to help me with my discovery process.

10. Therefore I am respectfully requesting an extension of three more months for my discovery period.

I sign this Declaration on the 22 day of April, 2024 in Minnetonka, Minnesota under penalty of perjury.



*Saeid Jaberian*  
12601 Ridgemount Avenue W.  
Minnetonka, MN 55305

Pro Se Defendant